

Message

From: Beachum, Collin [Beachum.Collin@epa.gov]
Sent: 3/10/2022 3:38:56 PM
To: Gillespie, Andrew [Gillespie.Andrew@epa.gov]
Subject: RE: AB6 sys rev concerns

I sent an email with my support for Jen applying for the detail to Jeff. Haven't heard back yet but I told him I would like to put it on the agenda for our next general. He is really interested in the science side of things which is great but that's the easy part of job. The hard part is managing, advocating, and deciding. That's where we need the help. We have lots of technically adept people. We need leadership. To be fair he hasn't been here very long so it is pretty unfair to think that he has a handle on everything already. Things have change quite a bit in the 2 years he's been gone. Maybe my impatience is getting the better of me this week...

Thanks again for the really good guidance Andy.

Collin Beachum Phd
Branch Chief
USEPA/OCSPP/OPPT/RAB 6
202-430-0621

From: Gillespie, Andrew <Gillespie.Andrew@epa.gov>
Sent: Thursday, March 10, 2022 8:32 AM
To: Beachum, Collin <Beachum.Collin@epa.gov>
Subject: RE: AB6 sys rev concerns

Sounds good, and sorry we didn't connect yesterday.

I think the most important overarching thing for Jeff to hear – hopefully from multiple BCs – is that DGAD has not been operating in good faith with ECRAD – they have hidden information, provided misleading information, not effectively managed their staff and contractors, deferred work and rework to ECRAD, and as a result, ECRAD is in a very vulnerable position with respect to RA schedules.

If Jeff does not deal with this, ECRAD will struggle for a very long time, morale will dive, turnover will increase, and they will be back to Old RAD days.

Perhaps the time is right for another 'reset' between DGAD and ECRAD. Has Jen expressed interest in going over to the dark side? If so, has Jeff been lobbied for support?

Andrew J. R. Gillespie, Ph. D.
Associate Director, US EPA/ORD/CEMM

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From: Beachum, Collin <Beachum.Collin@epa.gov>
Sent: Thursday, March 10, 2022 8:17 AM
To: Gillespie, Andrew <Gillespie.Andrew@epa.gov>
Subject: RE: AB6 sys rev concerns

Thanks Andy. I'm going to refocus the concerns accordingly. The biggest concern which was already relayed to Jeff is that the phthalate forms that were "finished" back in Jan/Dec are now not finished again and Battelle is waiting for us again. Just found out that this is a problem yesterday. These are old problems which is why this is so infuriating. We

continue to fix the same problems over and over and over again. Gaining alignment means squat if there is not action. Anyway thanks for the feedback. It helps to have another perspective especially in the moment. Have a good weekend. I'll let you know when I'm in the office next week. Maybe we can grab lunch or coffee.

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From: Gillespie, Andrew <Gillespie.Andrew@epa.gov>

Sent: Thursday, March 10, 2022 7:33 AM

To: Beachum, Collin <Beachum.Collin@epa.gov>

Subject: RE: AB6 sys rev concerns

Sounds frustrating. Let me know if you want to chat. My gut reaction is that the email is too long and wanders a bit, so I am not sure it makes your point.

I infer from this that DGAD continues to drag feet on DEHP, de facto resulting in reprioritizing the queue.

So maybe the simple message is something like

- RAB6 has the largest workload (as you say 7 of 22, 2 of 4 MRREs, etc) and a significant presence in Tranche 2
- DEHP is the key to making progress on that workload, but DGAD is not delivering – in fact they are obstructing
- **So you need Jeff's support to focus DGAD on DEHP – this is the ask:**
 - Need DGAD to accelerate the import of IRIS SR data for phthalates (to bridge the epi and animal tox gap)
 - Ask for Jeff's support to get DGAD to release DEHP references into distiller, so RAB6 can focus staff on phthalates – the swarm approach is not working, time to change approach.

If ECRAD could simply get DGAD to make the DEHP references available in distiller, your folks could do the rest. That seems like a simple ask. If DEHP moves, many others come along, so I would keep the focus on DEHP.

Are your other BCs on board with this messaging? It would be stronger if all of the BCs were unified in sticking to the order and not leaving RAB6 behind.

Has Jeff and/or Mark and/or Michal expressed strong support/desire for CRA? If so, add that to the list of points – if DEHP does not get moving, the window of opportunity to do a CRA may close with the next Administration.

Good luck... sorry this has to be so hard. Maybe it will get better with new DGAD SR leadership...

Andrew J. R. Gillespie, Ph. D.
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From: Beachum, Collin <Beachum.Collin@epa.gov>
Sent: Wednesday, March 09, 2022 6:31 PM
To: Gillespie, Andrew <Gillespie.Andrew@epa.gov>
Subject: AB6 sys rev concerns

Evening Andy,

I needed to get this email out without actually sending it. Would you mind looking this over before I bring these items up with Jeff? I decided not to send it but I needed to organize my thoughts for a conversation.

Thanks,
Collin

Evening Jeff,

First of all, thank you for meeting with Jen, John, and me this afternoon. They mean well and are looking out for the branch and the passion you heard today comes from a good place. We have worked very hard to keep the phthalates from being pushed further behind. Our branch is responsible for twice as many risk evaluations as most other branches. Just for perspective, we have 9 REs (4 tranche 2, 4 tranche 3, and 1 tranche 4). For perspective that is 1 less than the entire RAD did in 4 years with 1/5 the staff. We have been leaders in the overall systematic review efforts for the last year (some even longer) and are leading many other efforts across the division: dermal TOs, exposure, fate, engineering, and human health tech team SOP development, and CRA among others. Having to constantly defend the order of the chemicals is tiring and a needless distraction. We are constantly finding ways to help the division and office by providing significant contributions wherever we can. Continuing to push phthalates later and later in the review will only decrease our chances of completing our cumulative risk assessment before a potential change in administration at the end of 2024.

There are several synergies that come along with completing DEHP. DEHP is the key for reviewing studies. It has 60 – 90% overlap with the others. There are economies of scale that benefit the prioritization of DEHP. Because most studies are not unique across the phthalates, when you review 1 study you check off multiple chemicals, thus reducing the effort needed across the group. Yes, each study will take longer but not as long as reviewing studies targeted at a single chemical. This fits with the Distiller project approach as well and should incur efficiencies with the contractors also which save EPA money that can be redirected to completing more work.

If you follow the math it doesn't make sense to continuously demote our branch's responsibilities.

1. ECRAD responsibilities of RAB6
 - a. 7 of 22 HPS REs (includes asbestos and 1,4-D)
 - i. Asbestos, PAD, DEHP, DIBP, DBP, BBP, DCHP
 - b. 2 of 4 MRREs
 - i. DINP, DIDP
 - c. 2 of the science team efforts
 - i. CRA, PESS
 - d. 2 Test Order leads
 - i. Dermal, consumer
2. Status of systematic review of phthalates
 - a. Exposure – 47% of overall workload (5130 of 10741)
 - i. Phthalates ~44% complete
 - b. Animal tox – 52% of overall workload (913 of 1748)
 - i. Phthalates 0% complete
 - c. Epidemiology – 67% of overall workload (1186 of 1779)

- i. Phthalates < 1% complete – however IRIS reviews exist and the plan is to incorporate that without additional work
- d. Ecotox – 39% of overall workload (397 of 1020)
 - i. Phthalates ~48% complete

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